

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**DECLARATION OF ANDREW R.
KAUFMAN IN SUPPORT OF
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

I, Andrew R. Kaufman, declare:

1. I am an attorney in the law firm of Girard Sharp LLP. I am a member of the State Bars of Wisconsin and New York and am admitted to practice pro hac vice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein

2. Because the materials at issue were designated by Uber as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY," or because the material reflect deposition transcript automatically confidential under the Protective Order, Plaintiffs filed the following under seal:

Document	Description	Designating Party
[Unredacted] Plaintiff's Motion for Leave to Amend	Portion of briefing referring to documents designated confidential	Uber
[Unredacted] Luther Declaration	Portion of declaration referring to documents designated confidential	
Exhibit D	Uber's Responses to Plaintiff's Requests for Admission	Uber
Exhibit E	Excerpts of 7/10/25 Nilles Deposition	Uber

Document	Description	Designating Party
Exhibit F	Excerpts of 8/7/25 Nilles Deposition	Uber
Exhibit G	Document produced by Uber	Uber

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 22, 2025 in Milwaukee, Wisconsin.

/s/ Andrew R. Kaufman
Andrew R. Kaufman